



**Office of the
Special Narcotics Prosecutor
for the City of New York**

Bridget G. Brennan, Special Narcotics Prosecutor

80 CENTRE STREET, SIXTH FLOOR
NEW YORK, NY 10013
212-815-0400, GEN.
212-815-0440, FAX

November 16, 2020

BY ELECTRONIC DISCOVERY

Dear Counsel:

This disclosure letter concerns Undercover Detective #C00349 (“UC 349”) of the New York City Police Department (“the Department”), presently assigned to Narcotics Borough Manhattan South, whom the People intend to call as a witness in this case.

The Civilian Complaint Review Board noted “other misconduct” by UC 349 in that UC 349 had failed to prepare a memobook entry.

Pursuant to People v. Garrett, 23 N.Y.3d 878 (2014), the People are disclosing the following list of civil lawsuits in which UC 349 has been named in his/her capacity as a member of law enforcement. Publicly-available litigation materials related to these lawsuits are also being provided, to the extent the materials currently are in the People’s possession.

Case Name: JONES, MATTHEW VS P.O. MUNIZ, ADAM, ET AL.

Case Number: 16CV08080; Court: U.S. District Court - Southern District NY; Litigation Start Date: Mon Oct 31 2016

The decision to include information in this letter does not represent a conclusion by the People that all the information contained herein is required to be disclosed under the People’s constitutional, ethical or statutory obligations. Accordingly, the People reserve the right to move in limine to preclude or limit reference to the information in this letter in any further proceedings in this prosecution.

If you have any questions, feel free to contact me at (212) 815-0414.

Sincerely,

Lauren Di Giovanni

Lauren Di Giovanni
Assistant District Attorney